

August 8, 2023

VIA PACER

Hon. Philip M. Halpern
Hon. Charles L. Brieant, Jr.
Federal Building and Courthouse
300 Quarropas Street
White Plains, NY 10601

**Re: Victor Acevedo v. El Bandido, et al.
Case No. 1:22-cv-8180
Letter of Intent to Move to Be Relieved As Counsel and Requesting
Adjournment of Conference on 8/10/23**

Your Honor:


Michael J. Glidden and Anthony J. Bragaglia write jointly, in their personal capacities and not as members of the law firm that currently still represents all Defendants in this matter (The Wenderoff Law Group, PC), to request that this conference currently scheduled for August 10, 2023, be adjourned to a later date. Johnathan Trinidad Lira, who consents to this request, is the sole counsel of record for all Defendants of this pre-motion conference.

Briefly, both Mr. Glidden and Mr. Bragaglia are currently employed by Wilson Elser Moskowitz Edelman & Peltz LLP, a law firm that is not currently representing any of the Defendants in this matter. Briefly, both Mr. Glidden and Mr. Bragaglia are currently employed by Wilson Elser Moskowitz Edelman & Peltz LLP, a law firm that is not currently representing any of the Defendants in this matter. and the Defendants have not agreed to a representation agreement and therefore the Defendants are still currently represented by The Wenderoff Law Group. However, upon Mr. Glidden's departure from The Wenderoff Law Group, PC on July 27, 2023, The Wenderoff Law Group made the decision to close its civil litigation division, focusing solely on New York Workers' Compensation cases. There are currently no attorneys practicing at The Wenderoff Law Group who practice civil litigation in New York. As such, upon the advice of Wilson Elser's general counsel, Mr. Glidden and Mr. Bragaglia will be moving this Court today, pursuant to Local Rule

Application denied.

The Clerk of Court is respectfully directed to terminate the motion sequence pending at Doc. 51.

SO ORDERED.



Philip M. Halpern
United States District Judge

Dated: White Plains, New York
August 8, 2023

1.4, in their personal capacities, to be relieved as counsel for the Defendants. It is our understanding that The Wenderoff Law Group will also be moving this Court for the same relief in the immediate future, as well.

However, we now write to kindly request that the Court adjourn the conference scheduled on August 10, 2023, so that the Defendants can obtain new counsel. We will also be requesting a thirty (30) day stay of the proceedings in our motion to be relieved so that the Defendants are not prejudiced.

We thank you for your consideration of this matter.

Respectfully Submitted:

A handwritten signature in blue ink, appearing to read "Michael J. Glidden", is written over a horizontal line. A large, loopy blue oval is drawn around the signature and the line below it.

Michael J. Glidden, Esq. (MG8451)
(914) 363-1607

A handwritten signature in blue ink, appearing to read "Anthony J. Bragaglia", is written over a horizontal line.

Anthony J. Bragaglia, Esq. (AB3178)
(845) 596-5007